

1 [Counsel listed on signature page.]
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8 In re JDS UNIPHASE CORPORATION
SECURITIES LITIGATION

9 This Document Relates To: All Actions
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) Master File No. C-02-1486 CW (EDL)

) CLASS ACTION

) **STIPULATION AND ~~PROPOSED~~**
) **ORDER REGARDING EXTENSION OF**
) **CANADIAN NON-PARTY DISCOVERY**

1 WHEREAS, pursuant to the Court's Order dated December 8, 2006, Lead Plaintiff,
2 Connecticut Retirement Plans and Trust Funds ("Lead Plaintiff"), was granted until April 2, 2007 to
3 complete discovery with respect to Canadian non-party witnesses Thomas Pitre, Ken Bradley and
4 Gordon Buchan; and

5 WHEREAS, pursuant to the same December 8, 2006 Order, the Court granted Lead
6 Plaintiff the right to make a renewed request to extend the discovery deadline with respect to these
7 Canadian non-party witnesses; and

8 WHEREAS, the parties met and conferred on March 29, 2007 regarding an additional
9 extension of the discovery deadline with respect to these Canadian witnesses;

10 IT IS HEREBY STIPULATED by and between the parties, through their counsel of record,
11 that the parties jointly request that the Court grant Lead Plaintiff until May 15, 2007 to complete
12 discovery with respect to Thomas Pitre, Ken Bradley and Gordon Buchan.

13 IT IS HEREBY FURTHER STIPULATED that this joint request shall not waive Lead
14 Plaintiff's right to request an additional discovery extension, nor shall it waive Defendants' right to
15 oppose any future request to extend the discovery deadline.

16 Respectfully submitted,

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18 Dated: March 30, 2007

LABATON SUCHAROW & RUDOFF LLP

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20 By: /s/ Michael W. Stocker
Michael W. Stocker

21 Lead Counsel for Lead Plaintiff
22 Connecticut Retirement Plans and Trust Funds

23 BERMAN DeVALERIO PEASE TABACCO
24 BURT & PUCILLO

25 Liaison Counsel for Lead Plaintiff
26 Connecticut Retirement Plans and Trust Funds
27
28

1 Dated: March 30, 2007

MORRISON & FOERSTER LLP

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3 By: /s/ Philip T. Besirof
Philip T. Besirof

4 Attorneys for Defendants
5 JDS Uniphase Corporation, Charles J. Abbe, Jozef
6 Straus, and Anthony Muller

7 Dated: March 30, 2007

HELLER EHRMAN LLP

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9 By: /s/ Howard S. Caro
Howard S. Caro

10 Attorneys for Defendant
11 Kevin Kalkhoven

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16 PURSUANT TO STIPULATION, IT IS SO ORDERED

17 Dated: March 30, 2007

18 HONORABLE
United States



1 I, Michael W. Stocker, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Regarding: Extension of Discovery Period Solely for the Purpose
3 of Canadian Non-Party Discovery. In compliance with General Order 45, X.B., I hereby attest that
4 Philip Besirof, attorney for Defendants JDS Uniphase Corporation, Charles J. Abbe, Jozef Straus,
5 and Anthony R. Muller, and Howard Caro, attorney for Kevin Kalkhoven, have concurred in this
6 filing.

7
8 Dated: March 30, 2007

LABATON, SUCHAROW & RUDOLF LLP

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10 By: /s/ Michael W. Stocker
11 Michael W. Stocker
12 Counsel for Lead Plaintiff
13 Connecticut Retirement Plans
14 and Trust Funds
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